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LOUISE M PARENT

September 23, 2014

#### BY ECF

Honorable Thomas P. Griesa United States District Court for the Southern District of New York 500 Pearl Street New York, New York 10007

Re: Marie Laurette Dussault v. Republic of Argentina, No. 06 Civ. 13085 (TPG)

## Dear Judge Griesa:

I write to follow up on my letter dated August 28, 2014, in which I requested that the Court hold the "me too" *pari passu* motion filed by plaintiff in abeyance, or, in the alternative, that the Court permit the Republic of Argentina (the "Republic") approximately 30 days from the date of the letter to oppose the motion. As I noted then, the Court has quite rightly held that it would defer consideration of "me-too" motions to avoid a flood of additional claims at this juncture.

The Republic continues to believe that the same reasoning applies with even greater force here, where plaintiff's motion raises new issues of substantive law. If, however, the Court would prefer to receive briefing on these issues, the Republic respectfully requests that its opposition be due 30 days from any notice to that effect. The bonds that are the subject of plaintiff's "me too" motion are in fact governed by English law, and this timing will allow for

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the presentation of evidence of English law that will further demonstrate that plaintiff is not entitled to the relief she seeks.

Respectfully submitted,

Carmine D. Boccuzzi

cc: Counsel of Record (by email)